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August 29, 2002

The Honorable Gary E. Walsh
Executive Director
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region InterLATA Services Pursuant to Section 271 of the Telecommunications Act of 1996
Docket No.: 2001-209-C

Dear Mr. Walsh:

In Order No. 2002-77 in the above-captioned docket, the Commission ordered as follows:

> BellSouth shall include in the SQM appropriate metrics that measure and assess BellSouth's responsiveness to CLEC-initiated changes submitted to the Change Control Process ("CCP"), and BellSouth shall include at least one payment category under Tier 1 of the IPP for assessing the effectiveness of the CCP regarding CLECs.

BellSouth applauds this Commission for its foresight in recognizing the importance of the CCP in the overall 271 process. The FCC and other states have agreed, and the CCP has continued to evolve and improve. Since last summer's hearings in this docket the FCC found BellSouth's CCP compliant with Section 271 in its *Georgia/Louisiana Order.* Now to comply with this Commission's Order, BellSouth is taking several important steps with respect to measurements and penalties, each of which will be detailed in this filing. BellSouth has met with the Commission Staff to discuss these changes and to explain BellSouth's response to the Commission's order.

50/50 Prioritization Plan Has Been Implemented

BellSouth has continued to work collaboratively with CLECs on prioritization issues and to provide CLECs with sufficient information to be able to make informed

decisions regarding prioritization of proposed system changes. *See Georgia/Louisiana Order* ¶¶ 183, 193. Recently, the Florida Public Service Commission ("Florida Commission") voted to implement BellSouth's so-called 50/50 prioritization proposal whereby BellSouth and the CLECs share equally in the release capacity. Prior to the Florida Commission's adoption of the proposal, KPMG commented favorably on it in its draft Final Report in the OSS Third Party Test. *See* KPMG, BellSouth Telecommunications, Inc. OSS Evaluation Project, Draft Final Report, Version 1.0 (June 21, 2002). To enable the CCP to effectively implement this prioritization plan, BellSouth now provides CLECs with release plans and change capacity information, both projected and historical. For example, thus far, BellSouth has provided CLECs with two proposed release plans for 2003, one plan with an industry release and one plan without such a release. The release plans set forth, in units, the capacity for each release. BellSouth then provided the CLECs with first quarter 2002 historical usage, and sizing information (also in units) for 40 out of 42 possible change requests eligible for prioritization (the remaining 2 could not be sized). The CLECs used this information to prioritize change requests. Once prioritized, BellSouth uses the prioritization to scope its releases - for example, BellSouth used the May 15, 2002 prioritization list to scope the first 2003 production release. BellSouth is scheduled to provide the scope for the second 2003 release on September 6, 2002.

The 50/50 prioritization plan, in and of itself, should provide the Commission with a high degree of comfort that BellSouth will continue to be responsive to CLEC-initiated change requests. The 50/50 plan will allocate one-half of BellSouth's IT release capacity to the CLEC community for the implementation of CLEC desired changes. The CLECs will prioritize CLEC and BellSouth change requests, (Type 4s and Type 5s) for their release according to their business needs. **BellSouth does not have input into this process.** BellSouth agrees, however, with the CLECs that the regulatory change requests (Type 2s) and defects (Type 6s) will be implemented ahead of CLEC-initiated change requests (Type 5s) and any Type 4 change requests that the CLECs elect to include in their production releases. If they so elect, the Type 4s will be prioritized with the Type 5s after the 2s and 6s.

BellSouth will use the remaining half of planned production release capacity. BellSouth will prioritize and implement its production release capacity according to its business needs. BellSouth will likewise implement Type 2 and Type 6 change requests ahead of Type 4 change requests. BellSouth may include CLEC-initiated change requests (Type 5's) in its production releases, but if it should choose to do so, Type 5's would be implemented after the Type 2's and Type 6's in accordance with the agreement between BellSouth and the CLECs.

BellSouth provides CLECs with the information they need to efficiently prioritize change requests. BellSouth provides CLECs with estimates of capacity for all Type 4

and Type 5 change requests. This sizing information is a preliminary estimate of the work effort.[1] The CCP members provide this information to the CLECs as part of the change review meeting package that is distributed to all CCP participants five to seven business days before the meeting. The template for the form that the CCP participant completes for each Type 4 and Type 5 change request is located in Appendix H to the CCP document. In addition to the sizing information, BellSouth provides CLECs with a schedule of upcoming releases.

Importantly, BellSouth has continued to concentrate as much on adherence to the process as it has on process improvements. There is no question that BellSouth has continued to comply with the process, including the provision of documentation. *See Georgia/Louisiana Order* ¶¶ 192-193 & 196, n.753. By year-end 2002, BellSouth expects to have implemented 40 change requests for features, including the CLECs' Top 15 requests. In short, BellSouth is working with, and being responsive to CLECs.

BellSouth Has Voluntarily Implemented 6 New CCP Measures and 3 IPP Penalties

In conjunction with the evolution and growth of the process itself, and after extensive work by the Florida and Georgia Commissions, as well as this Commission, BellSouth has voluntarily implemented 6 new change control measures that it believes both comply with the spirit of the Commission's Order and provide more than sufficient information for regulators and CLECs to monitor BellSouth's on-going compliance with the CCP. Because the CCP is a regional process, BellSouth has voluntarily agreed to implement these measures in all nine states. The measures are as follows:

- CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days
- CM-7: Percent of Change Requests Accepted or Rejected Within 10 Days
- CM-8: Percent of Change Requests Rejected
- CM-9: Number of Defects in Production Releases (Type 6 CR)
- CM-10: Software Validation

[1] After prioritization, each interface is assessed in depth to determine the scope of the change request. Based on the assessment, an adjustment in the sizing may be required.

- CM-11: Percent Of Change Request Implemented Within 60 Weeks of Prioritization[2]

Copies of the SQM pages and the relevant IPP addendum for these measures are attached to this letter as Exhibit A. In conjunction with these measures, BellSouth will voluntarily pay Tier 2 penalties on measures CM-6, CM-7 and CM-11.

When coupled with the previously approved 5 CCP measures, BellSouth will provide this Commission with data for 11 CCP measures, 5 of which have Tier 2 penalties attached to them. A list of all 11 CCP measures is attached hereto as Exhibit B. There is no question that these measures will allow the Commission to "assess BellSouth's responsiveness to CLEC-initiated changes submitted to the [CCP]," both in terms of acceptance and implementation, as well as monitor the quality of the releases BellSouth implements.

Tier 1 Penalty Is Not Appropriate

The Commission's Order on Reconsideration specified that BellSouth and the Commission staff should address whether a CCP penalty should be Tier 1 or Tier 2. The following will explain that Tier 1 penalties are neither appropriate nor necessary to accomplish the Commission's goals. First, the extensive nature of both the measurements and the penalties that BellSouth has put into place regarding CCP far exceed the scope of the measurements in place in November 2001 when the Commission issued its order. While the Commission may have believed a Tier 1 penalty was appropriate at that time, the risks inherent in a Tier 1 CCP penalty now far outweigh any perceived benefits. Moreover, as discussed above, both Florida and Georgia have had significant involvement in the evolution of the CCP measures and penalties and neither considered Tier 1 penalties; none of the other 6 states in which BellSouth has voluntarily implemented these measures or penalties suggested Tier 1 penalties either.

A Tier 1 penalty for a CCP measure is an invitation to the CLECs to game the measurement process and the CCP process. As the Commission is aware, a Tier 1 penalty is paid when a CLEC is harmed individually, i.e. when its service orders are not provisioned correctly or its orders are not submitted on time. The CCP, in stark contrast, is a collaborative process designed to benefit the industry as a whole, not individual CLECs. The CCP members jointly prioritize change requests, resolve issues and work to implement system changes for the good of the industry as a whole. Requiring a Tier 1 penalty, paid to individual CLECs, would create an incentive for the CLECs to manipulate the process for the individual good rather than the good of the entire CCP.

[2] Acceptance of change requests is subject to technical feasibility, cost, and industry standards.

For example, a CLEC could submit a large number of meaningless requests in an attempt solely to receive payments for those rejected and not implemented.

Moreover, the Tier 2 penalties provided for in the attached measurements will provide BellSouth with an incentive, in addition to those incentives that already exist, to be responsive to CLEC-initiated change requests. There is no increased incentive achieved for addressing CLEC-initiated changes submitted to the CCP by assessing a Tier 1 penalty. In other words, the point of Tier 1 penalties is to pay on a CLEC-by-CLEC basis for independent harms caused to particular CLECs until such time as the harm becomes industry-wide at which point the Tier 2 penalties are appropriate. In the case of the CCP, an industry-wide process at the outset, there is no need for the incremental penalties – a failure in the process affects all members of the CCP (not just individual members) and thus it is appropriate to escalate immediately to Tier 2 penalties.

Finally, a Tier 1 penalty for CCP would be almost impossible to administer. Take, for example, a change request submitted by CLEC A. While CLEC A remains the originator of the request, once the request is accepted by the CCP, it goes into Pending status awaiting prioritization by the CLECs as a whole. While the change request may be a high priority for CLEC A, it may not be for the industry as a whole. Under this scenario, during the prioritization process, the request would be ranked very low and thus might not be implemented in 60 weeks. The low prioritization, however, is how the system works – it does not entitle CLEC A to an individual penalty simply because its request was deemed of lesser importance by the industry as a whole. In short, the IPP is designed to motivate BellSouth to continue to meet its obligations after receiving 271 approval in South Carolina – it is not designed to be a CLEC-enrichment plan. Therefore, BellSouth respectfully asks the Commission to accept the five Tier 2 penalties proposed by BellSouth in lieu of one Tier 1 penalty described in the Commission's Order.

Additional CCP Improvements Are Under Development

While the FCC found BellSouth's CCP compliant with Section 271 in its *Georgia/Louisiana Order*, BellSouth has not only continued to meet its obligations, but has met the FCC's challenge to continue to develop the process. For example, BellSouth has continued to provide a forum whereby BellSouth and CLECs can continue to discuss and implement improvements to the change control process. Since November 6, 2001, BellSouth has held 84 CCP meetings, many of which focused on process improvements. The progress made by the participants has been significant. Among other things, the CCP has adopted the CLEC definition of "CLEC-Affecting Change" to govern the scope of the CCP; BellSouth has agreed to provide change request capacity information; BellSouth has agreed to enlarge the scope of the CCP to include "development" of new interfaces as opposed to just "implementation" of new interfaces; BellSouth has agreed to

enlarge the scope of the CCP to include documentation changes; and BellSouth has agreed to lengthen the notification period for retirement of interfaces from 120 to 180 days. The collaboration on possible process improvements continues today. Since the beginning of June alone, BellSouth and the CLECs have met on multiple different occasions to discuss additional process improvements including initial requirements for a new CLEC testing website; corrections of defects found in "frozen" maps of interfaces; and BellSouth's proposal to allow CLECs to participate in a "go/no go" decision on software releases.

While all aspects of the change control process have been open for discussion, BellSouth has continued specifically to collaborate with CLECs to increase the transparency of the internal prioritization process. *See Georgia/Louisiana Order* ¶ 185. To that end, BellSouth has agreed to provide to the CLECs information on BellSouth's Legacy System releases via the CCP website and all BellSouth maintenance release information via the CCP Change Control Release Schedule. In addition, BellSouth now posts all Type 2 through Type 6 change requests to the Flagship Feature Release Schedule for the CLECs' use. Moreover, BellSouth now brings representatives from the Local Carrier Service Center (LCSC) and its Information Technology group to the CCP meetings, and has committed to bring subject matter experts as required. Finally, BellSouth now provides the CCP with a tracking report in which the status of all change requests is summarized.

In addition, BellSouth has followed through on its commitment to implement a fourth level of escalation in the dispute resolution procedure. *See Georgia/Louisiana Order* ¶ 186, n.699. Specifically, in Ballot #13, BellSouth asked the CLECs to vote to change the escalation process to start with a higher management level (Operations – Assistant Vice President) and end with a higher management level (Network – Vice President). On the ballot, the CLECs unanimously agreed to this change and BellSouth updated the CLEC website with this information on July 29, 2002.

CLEC Application Verification Environment ("CAVE") Is Available

With respect to testing, BellSouth continues to improve its CAVE test environment. *See Georgia/Louisiana Order,* ¶ 190. CAVE has been available to CLECs for most of 2002. CAVE was available for pre-soak testing for Release 10.5 from May 6 - June 1 (immediately prior to the release). For Release 10.6, pre-soak testing began on July 26 and continued through August 23. In addition, CAVE will be available for post-release testing from August 23 through November 8. Pre-soak testing for Release 11.0 is scheduled to start in CAVE on November 11 and run through December 6. Thus, BellSouth is providing CCP members with ample testing opportunities. In addition, BellSouth is working with the CLECs to improve the CAVE testing process. Some of the improvements the CCP has discussed include: the establishment of a testing profile; the elimination of the requirement for a formal test agreement; implementation of regression

testing; and the implementation of a more defined defect management process. Moreover, as a result of CLEC input, BellSouth agreed to draft change requests to allow CLECs to test in CAVE using their own data and to enhance CAVE to allow CLECs to test multiple versions of CAVE. Finally, with Release 10.6, BellSouth implemented a pre-release testing status report identifying unresolved defects. BellSouth updated this report on a daily basis through production implementation of the release. This report provided CLECs with information on defects/issues in the release. Coupled with that report, BellSouth conducted weekly conference calls during pre-release CAVE testing to provide the opportunity for comment and the exchange of information related to the testing.

Other Software Testing Improvements Are Being Implemented

Finally, BellSouth continues to implement improvements to its software testing and implementation to reduce defects to a minimum, including "consider[ing] any input from competitive LECs regarding software problems they discover during testing before BellSouth decides to implement a new software release." *See Georgia/Louisiana Order* ¶¶ 181, 195. By all external standards, Release 10.5 was a success. The QP Management Group, in a study conducted for BellSouth, concluded that BellSouth's software is comparable to the industry "best in class" in terms of defects per function point. Moreover, while there were defects, the defects were either minor or, if not minor, were fixed quickly.

That being said, BellSouth is continuing to look for ways to improve the quality of its software releases. To that end, BellSouth modified its implementation of Release 10.6 to "push" existing LSRs through the systems before installing the new software to avoid, to the extent possible, the defects that appear as a result of LSRs in progress in the old software. In addition, BellSouth hired a third party vendor to expand BellSouth's internal test deck cases used by BellSouth during internal release testing to try to capture as wide a variety of possible defects as is practicable. This expanded test deck will be available for CLECs to use in CAVE as well. These efforts appeared to have paid off. Two days after implementation of Release 10.6, BellSouth was aware of only 5 defects, 4 of which were Severity 3, and which affected only a sub-set of UCL-ND orders. Moreover, the Florida Commission ordered new defect timeframes that BellSouth has implemented - 10 business days for high impact; 30 business days for medium impact; and 45 business days for low impact. Last, BellSouth has proposed to the CCP that CLECs that have tested in CAVE participate in a go/no go decision in which they would either recommend that a particular release go forward as scheduled, or that BellSouth defer implementation to a later date (based on two established criteria namely an unresolved validated severity level 1 defect, or an unresolved validated severity level 2 defect with no workaround). Under BellSouth's proposal, the vote would take place one week before the scheduled implementation date of the release. BellSouth would then use

this recommendation, in conjunction with the recommendations of its quality assurance testing teams and its testing information, to make a final decision on implementation of the release. This proposal is still under consideration by the CCP.

Conclusion

In conclusion, the FCC found BellSouth's CCP compliant with Section 271 in its *Georgia/Louisiana Order.* Further, the CCP process has evolved since the Commission approved BellSouth 271 application in November 2001. First, the 50/50 plan will allocate one-half of BellSouth's IT release capacity to the CLEC community for the implementation of CLEC desired changes. Further, BellSouth has implemented six new CCP measures, three of which have penalties associated with them. This now provides eleven measures and five Tier 2 penalties for this Commission's use in reviewing BellSouth's compliance with the CCP and with its responsiveness to CLEC-initiated change requests. Additionally, BellSouth has held 84 CCP meetings with CLECs since November 6, 2001. These new measures and actions meet, and arguably exceed, the scope of the Commission's Order. Thus, BellSouth respectfully submits this proposal for approval pursuant to the Commission's Order No. 2002-77.

Sincerely,

Caroline N. Watson

CNW/nml
Enclosure
PC Docs # 460322

CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days

Definition

Measures the percent of Software Errors corrected by BellSouth in X (10, 30,45) business days within the report period.

Exclusions

- Software Corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs.
- Rejected or reclassified software error. (BellSouth must report the number of rejected or reclassified software errors disputed by the CLECs.)

Business Rules

This metric is designed to measure BellSouth's performance in correcting identified Software Errors within the specified interval. The clock starts when a Software Error is validated per the Change Control Process, a copy of which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html, and stops when the error is corrected and notice is posted to the Change Control Website. Software defects are defined as Type 6 Change Requests in the Change Control Process.

Calculation

Percent of software Errors Corrected in X (10, 30, 45) Business Days = (a / b) x 100

- a = Total number of Software Errors corrected where "X" = 10, 30, or 45 business days.
- b = Total number of Software Errors requiring correction where "X" = 10, 30, or 45 business days.

Report Structure

- Severity 2 = 10 Business Days
- Severity 3 = 30 Business Days
- Severity 4 = 45 Business Days

Data Retained

- Report Period
- Total Completed
- Total Completed Within X Business Days
- Disputed, Rejected or Reclassified Software Errors

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

CM-7: Percent of Change Requests Accepted or Rejected Within 10 days

Definition

Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests, submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

Exclusions

- Change Requests that are canceled or withdrawn before a response from BellSouth is due.

Business Rules

The Acceptance/Rejection interval starts when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html,. The clock ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

Calculation

Percent of Change Requests Accepted or Rejected within 10 Business Days = (a / b) x 100

- a = Total number of Change Requests accepted or rejected within 10 business days.
- b = Total number of Change Requests submitted in the reporting period.

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Requests Accepted or Rejected
- Total Requests

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

SEEM Measure

SEEM Measure		
Yes	Tier I Tier II	Yes

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

CM-8: Percent Change Requests Rejected

Definition

Measures the percent of Change Requests other than (Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected by reason within the report period.

Exclusions

- Change Requests that are cancelled or withdrawn by CLEC before a response from BellSouth is due.

Business Rules

This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejections per the Change Control Process, a copy of which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html, These reasons are: Cost, Technical Feasibility, and Industry Direction. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

Calculation

Percent Change Requests Rejected = (a / b) x 100

- a = Total number of Change Requests rejected.
- b = Total number of Change Requests submitted within the report period.

Report Structure

- BellSouth Aggregate
- Cost
- Technical Feasibility
- Industry Direction

Data Retained

- Report Period
- Requests Rejected
- Total Requests

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region • Reason – Cost • Reason – Technical Feasibility • Reason – Industry Direction	• Diagnostic

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

CM-9: Number of Defects in Production Releases (Type 6 CR)

Definition

Measures the number of defects in Production Releases. This measure will be presented as the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Prodution Release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, and Severity 3 defects can be found in the Change Control Process Document.

Exclusions

None.

Business Rules

This metric measures the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Prodution Release date. The definitions of Type 6 Change Requests (CR) and Severity 1, 2, and 3 defects can be found in the Change Control Process, which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html.

Calculation

- The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, and the number of Type 6 Severity 3 defects.

Report Structure

- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

Data Retained

- Region
- Report Period
- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region--Number of Type 6 Severity 1 defects	• 0 Defects
• Region--Number of Type 6 Severity 2 defects without a mechanized work around	• 0 Defects
• Region--Number of Type 6 Severity 3 defects	• 0 Defects

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

CM-10: Software Validation

Definition

Measures software validation test results for Production Releases of BellSouth Local Interfaces.

Exclusions

- None

Business Rules

BellSouth maintains a test deck of transactions that are used to validate that functionality in software Production Releases work as designed. Each transaction in the test deck is assigned a weight factor, which is based on the weights that have been ass gned to the metrics. Within the software validation metric weight factors will be allocated among transaction types (e.g., Pre-Order, Order Resale, Order UNE, Order UNE-P) and then equally distributed across transactions within the specific type.

BellSouth will begin to execute the software validation test deck within one (1) business day following a Production Release. Test deck transactions will be executed using Production Release software in the CAVE environment. Within seven (7) business days following completion of the Production Release software validation test in CAVE, BellSouth will report the number of test deck transactions that failed. Each failed transaction will be multiplied by the transaction's weight factor.

A transaction is considered failed if the request cannot be submitted or processed, or the results in incorrect or improperly formatted data.

Calculation

This software validation metric is defined as the ratio of the sum of the weights of failed transactions using Production Release software in CAVE to the sum of the weights of all transaction in the test deck.

- Numerator = Sum of weights of failed transactions
- Denominator = Sum of weights of all transactions in the test deck

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Production Release Number
- Test Deck Weights
- % Test Deck Weight Failure

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• <= 5%

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable

CM-11: Percent of Change Requests Implemented Within 60 weeks of Prioritization

Definition

Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

Exclusions

- Change requests that are implementated later than 60 weeks with the consent of the CLECs.
- Change requests for which BellSouth has regulatory authority to exceed the interval

Business Rules

This metric is designed to measure BellSouth's performance in implementing prioritized change requests. The clock starts when a change request has been prioritized as described in the Change Control Process. The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will begin reporting this measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of this measure.

Calculation

Percent of Type 5 CLEC initiated Change Requests implemented on time = (a / b) x 100

- a = Total number of prioritized Type 5 CLEC initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 5 CLEC initiated Change Requests from the date of the release prioritization list

Percent of Type 4 BellSouth initiated Change Requests implemented on time = (a / b) x 100

- a = Total number of prioritized Type 4 BellSouth initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 4 BellSouth initiated Change Requests from the date of the release prioritization list

Report Structure

- BellSouth Aggregate
- Type 4 requests implemented
- Type 5 requests implemeted
- % implemented within 16, 32, 48, and 60 weeks

Data Retained

- Region
- Report Month
- Total implemented by type
- Total implemented within 60 weeeks

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval
• Type 4 requests implemented	• 95% within interval
• Type 5 requests implemented	• 95% within interval

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

2. Tier 2 Submetrics

Table B-2 contains a list of Tier 2 submetrics.

Table B-2: Tier 2 Submetrics

Item No.	Tier 2 Sub Metrics
1	Average Response Time - Pre-Ordering/Ordering
2	Interface Availability - Pre-Ordering/Ordering
3	Interface Availability - Maintenance & Repair
4	Loop Makeup - Response Time - Manual
5	Loop Makeup - Response Time - Electronic
6	Acknowledgement Message Timeliness - EDI
7	Acknowledgement Message Timeliness - TAG
8	Acknowledgement Message Completeness EDI
9	Acknowledgement Message Completeness TAG
10	Percent Flow-through Service Requests (Summary)
11	Reject Interval
12	Firm Order Confirmation Timeliness
13	Firm Order Confirmation and Reject Response Completeness - Fully Mechanized
14	Percent Missed Installation Appointments - Resale POTS
15	Percent Missed Installation Appointments - Resale Design
16	Percent Missed Installation Appointments - UNE Loop and Port Combinations
17	Percent Missed Installation Appointments - UNE Loops
18	Percent Missed Installation Appointments - UNE xDSL
19	Percent Missed Installation Appointments - UNE Line Sharing
20	Percent Missed Installation Appointments - Local IC Trunks
21	Average Completion Interval - Resale POTS
22	Average Completion Interval - Resale Design
23	Average Completion Interval - UNE Loop and Port Combinations
24	Average Completion Interval - UNE Loops
25	Average Completion Interval - UNE xDSL
26	Average Completion Interval - UNE Line Sharing
27	Average Completion Interval - Local IC Trunks
28	Coordinated Customer Conversions Interval - Unbundled Loops
29	Coordinated Customer Conversions - Hot Cut Timeliness Percent within interval - UNE Loops
30	Coordinated Customer Conversions - Percent Provisioning Troubles Received within 7 days of a completed service order - UNE Loops
31	Cooperative Acceptance Testing - Percent UNE xDSL Loops Tested
32	Percent Provisioning Troubles within 30 days of Service Order Completion - Resale POTS
33	Percent Provisioning Troubles within 30 days of Service Order Completion - Resale Design

Table B-2: Tier 2 Submetrics (Continued)

Item No.	Tier 2 Sub Metrics
34	Percent Provisioning Troubles within 30 days of Service Order Completion - UNE Loop and Port Combinations
35	Percent Provisioning Troubles within 30 days of Service Order Completion - UNE Loops
36	Percent Provisioning Troubles within 30 days of Service Order Completion - UNE xDSL
37	Provisioning Troubles within 30 days of Service Order Completion - UNE Line Sharing
38	Percent Provisioning Troubles within 30 days of Service Order Completion - Local IC Trunks
39	LNP - Percent Missed Installation Appointments
40	Missed Repair Appointments - Resale POTS
41	Missed Repair Appointments - Resale Design
42	Missed Repair Appointments - UNE Loop and Port Combinations
43	Missed Repair Appointments - UNE Loops
44	Missed Repair Appointments - UNE xDSL
45	Missed Repair Appointments - UNE Line Sharing
46	Missed Repair Appointments - Local IC Trunks
47	Customer Trouble Report Rate - Resale POTS
48	Customer Trouble Report Rate - Resale Design
49	Customer Trouble Report Rate - UNE Loop and Port Combinations
50	Customer Trouble Report Rate - UNE Loops
51	Customer Trouble Report Rate - UNE xDSL
52	Customer Trouble Report Rate - UNE Line Sharing
53	Customer Trouble Report Rate - Local IC Trunks
54	Maintenance Average Duration - Resale POTS
55	Maintenance Average Duration - Resale Design
56	Maintenance Average Duration - UNE Loop and Port Combinations
57	Maintenance Average Duration - UNE Loops
58	Maintenance Average Duration - UNE xDSL
59	Maintenance Average Duration - UNE Line Sharing
60	Maintenance Average Duration - Local IC Trunks
61	Percent Repeat Troubles within 30 days - Resale POTS
62	Percent Repeat Troubles within 30 days - Resale Design
63	Percent Repeat Troubles within 30 days - UNE Loop and Port Combinations
64	Percent Repeat Troubles within 30 days - UNE Loops
65	Percent Repeat Troubles within 30 days - UNE xDSL
66	Percent Repeat Troubles within 30 days - UNE Line Sharing
67	Percent Repeat Troubles within 30 days - Local IC Trunks
68	Invoice Accuracy
69	Mean Time to Deliver Invoices
70	Usage Data Delivery Accuracy

Table B-2: Tier 2 Submetrics (Continued)

Item No.	Tier 2 Sub Metrics
71	Trunk Group Performance - Aggregate
72	Collocation Percent of Due Dates Missed
73	Timeliness of Change Management Notices
74	Timeliness of Documents Associated with Change
75	Percent of Software Errors Corrected in X (10, 30, 45) Business Days
76	Percent of Change Requests Accepted or Rejected Within 10 Days
77	Percent of Change Requests Implemented Within 60 Weeks of Prioritization
78	Service Order Accuracy - Resale Residence
79	Service Order Accuracy - Resale Business
80	Service Order Accuracy - Resale Design (Specials)
81	Service Order Accuracy - UNE Specials (Design)
82	Service Order Accuracy - UNE (Non-Design)
83	Service Order Accuracy - Local Interconnection Trunks

CM-1: Timeliness of Change Management Notices
•Measures whether CLECs receive required software release notices on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change.

CM-2: Change Management Notice Average Delay Days
•Measures the average delay days for change management system release notices sent outside the time frame set forth in the Change Control Process.

CM-3: Timeliness of Documents Associated with Change
•Measures whether CLECs received requirements or business rule documentation on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change.

CM-4: Change Management Documentation Average Delay Days
•Measures the average delay days for requirements or business rule documentation sent outside the time frames set forth in the Change Control Process.

CM-5: Notification of CLEC Interface Outages
•Measures the time it takes BellSouth to notify the CLEC of an outage of an interface.

CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days
•Measures the percent of Software Errors corrected by BellSouth in X (10, 30,45) business days within the report period.

CM-7: Percent of Change Requests Accepted or Rejected Within 10 days
•Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests, submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

CM-8: Percent Change Requests Rejected
•Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests submitted by CLECs that are rejected by reason within the report period.

CM-9: Number of Defects in Production Releases (Type 6 CR)
•Measures the number of defects in Production Releases.
This measure will be presented as the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, and Severity 3 defects can be found in the Change Control Process Document.

CM-10: Software Validation
•Measures software validation test results for Production Releases of BellSouth Local Interfaces.

CM-11: Percent of Change Requests Implemented Within 60 weeks of Prioritization
•Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.